

October 11, 2006

Mr. Dave Walls  
Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

RE: California State Fire Marshal's proposed code changes

Dear Mr. Walls:

As Chief Executive Officer and President of The Pacific Lumber Company, I write to advise you of our concerns with regard to the State Fire Marshal's proposed changes to the 2006 International Building Code currently being considered for adoption in California.

The Pacific Lumber Company has been an important source of commerce and employment for the North Coast of California for over 100 years. We currently employ 550 skilled men and women in solid jobs that provide good wages and benefits. You can understand how these proposed regulations are of great interest to The Pacific Lumber Company's employees and their families. Adoption of the International Building Code by California, with only limited amendments, would benefit California's own building industry. Indeed, a single national building code with very limited amendments will help those who build, design, and manufacture products to sell more efficiently across state lines.

We do recognize that California must make limited amendments to the International Building Code to address issues required by California state law. We believe, however, that the over 900 code changes prepared by the Fire Marshal's office are unnecessary and unusually complex.

We support our position with the following facts:

1. Increases in safety are to be balanced against increases in cost of construction according to California law. The "Nine Point Analysis" should be implemented when analyzing proposed amendments. To date, no analysis has been offered regarding increased fire safety.
2. The American Institute of Architects conducted an analysis and concluded there would be a dramatic increase in construction costs.

3. The new ICC codes represent state of the art codes developed in an international consensus forum. They represent thoughtful thinking on issues of safety and cost.
4. The proposed amendments are significantly different from the International Building Code when compared with all other states. Industry professionals will be required to spend a significant amount of time learning California's "unique" building codes.
5. The International Building Code provides a set of requirements that are inter-related. The manner in which these provisions work together to provide safety at acceptable costs are diminished when sections of the code are arbitrarily changed.
6. We believe the International Building Code provisions are supported by strong, available data. Other states with model building codes contain comparable or more liberal provisions.

We strongly support the ICC International Building Code as it was adopted through a fair and open process. Further, it was developed as a national model representing the best consensus thinking of building officials. We urge you to adopt the model International Codes with the fewest possible amendments.

We thank you for considering our comments, and we look forward to our continued relationship with the State of California Fire Marshal.

Respectfully submitted,

GEORGE A. O'BRIEN  
President and CEO

GAO:kw

cc: Rosario Marin  
Kate Dargan